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REMARKS

Claims 1-22 are currently pending in the subject application and are presently under consideration. Claims 2-7, 9-12, and 15 have been amended herein to correct minor informalities. Additionally, claims 1, 8, 14, 16, 18, and 21 have been amended to further emphasize various novel features and the subject invention. A version of the claims is listed at pages 2-7 of this Reply. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

Rejection of Claims 1-22 Under 35 U.S.C. §102(b)

Claims 1-22 stand rejected under 35 U.S.C. §102(b) as being anticipated by Sarkar (US 6,012,067). Withdrawal of this rejection is respectfully requested for at least the following reasons. Sarkar does not teach or suggest each and every limitation recited in the subject claims.

"A claim is anticipated only if *each and every element* as set forth in the claim is found, either expressly or inherently described in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987). Emphasis added. "*The identical invention must be shown in as complete detail as is contained in the...claim.*" *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Independent claims 1, 8, and 14

Applicants' claimed invention relates to an application development system. The claimed invention can discover the design time attributes of a component and simulate how a component behaves at run time without the need to reconstruct the component. In particular, independent claim 1 (and similarly independent claims 8 and 14) recites, "*a development tool that facilitates application development in a design time environment and reports at least on of simulated run time and compile time information based upon design time attributes*". Sarkar does not disclose or suggest these novel features.

Rather, Sarkar relates to a method and apparatus for storing and *manipulating* objects in a plurality of relational data managers *on the web*. In particular, Sarkar

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employs Uniform Resource Locators (URLs) in order to locate objects it can manipulate. Col. 5, ll. 26-29; col. 8, ll. 53-56. Accordingly, these objects *must* be addressable *via* the Internet, and the reference contextually indicates that “object” and “web object” are synonymous. More particularly, the reference provides a mechanism for manipulating (*i.e.*, applying business application logic to) web objects (*i.e.*, query results from other relational databases or multimedia web objects like text, audio, and video). Col 1, ll. 11-17. In essence, Sarkar interfaces a web browser (first tier) to relational databases (third tier). Col. 6, line 56; Fig. 1. It is therefore evident, that irrespective of other deficiencies of Sarkar, the reference does not manipulate objects in *a design time environment* (of application development), but instead in a relational database environment on the web. As it is well known that applications are not developed *via* browsers networked to relational databases, it is apparent that the cited reference, Sarkar, does not anticipate the novel development tool recited in the subject claim(s).

Similarly, while the reference may disclose *communication with applications* *e.g.*, business logic on a web server (col. 6, ll. 61-63), Sarkar does not facilitate *development of any applications*. As such, it is clear that the reference does not teach or suggest a development tool that facilitates application development in a design time environment and *reports at least one of simulated run time and compile time information based upon design time attributes*. Accordingly, this rejection of independent claims 1, 8, and 14 as well as all claims that depend there from, should be withdrawn.

Independent claims 16, 18, and 21

The subject invention further relates to a component based environment wherein static metadata can be compiled in a component and can then be dynamically adjusted to reflect modifications in design time. In accordance therewith, run time behavior of a component can be simulated based upon design time manipulations without recompiling the component. In particular, independent claim 16 (and similarly independent claims 18 and 21) recites, “manipulating *compile time information regarding the instance of the component...for simulating component behavior at one of a design time and a runtime*”. Sarkar does not disclose or suggest these novel features.

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At pages 6-7, the Office Action contends Sarkar discloses the aforementioned features at col. 5, ll. 11-14. However, the indicated portions simply recite, "*It is a primary objective of the present invention to provide a mechanism for representing and manipulating heterogeneous objects in relational databases over the internet.*" The Office Action incorrectly construes a mechanism for representing objects in relational database as equivalent to *simulating component behavior at one of a design time and a runtime*. Sarkar "represents" web objects by encapsulating them in well-known Java constructs. Col. 9, ll. 9-11; col. 5, ll. 37-39. In contrast applicants' invention can provide functionality that is neither contemplated by the reference nor the conventional Java libraries the reference employs. Sarkar is void of any teaching or suggestion of manipulating *compile time information regarding the instance of the component...for simulating component behavior at one of a design time and a runtime*. Accordingly, the withdrawal of this rejection of independent claims 16, 18, and 21, as well as all associated dependent claims, is requested.

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CONCLUSION

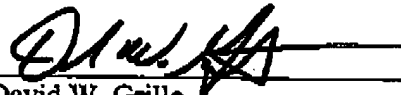
The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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